

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

MDL NO. 16-2738 (FLW) (LGH)

*THIS DOCUMENT RELATES TO ALL CASES*

**PLAINTIFFS' CROSS NOTICE OF TAKING ORAL  
DEPOSITION OF JOANNE WALDSTREICHER, M.D.**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure, Plaintiffs, by and through the undersigned counsel, hereby cross-notice the videotaped deposition upon oral examination of Joanne Waldstreicher, M.D. in the above-referenced matter. A copy of the original deposition notice is attached as Exhibit A.

Plaintiffs reserve the right to take a supplemental (non-duplicative) deposition of Dr. Waldstreicher as may be needed based upon the production of documents and other discovery to occur subsequent to the presently scheduled deposition.

The deposition will take place before a person authorized to administer oaths and will continue until completed at the following time and place:

April 19, 2017, at 9:00 a.m. (EST)

Conference Room at  
Drinker, Biddle & Reath  
600 Campus Drive  
Florham Park, NJ 07932

The deposition will be videotaped before a certified court reporter, and may be used for the purposes of discovery or for use by Plaintiff as evidence at trial, both. You are invited to appear and take part in the examination as you deem appropriate.

Dated: April 4, 2017

Respectfully submitted,

/s/ Michelle A. Parfitt  
MICHELLE A. PARFITT  
Ashcraft & Gerel, LLP  
4900 Seminary Road, Suite 650  
Alexandria, Virginia 22311  
703-931-5500  
[mparfitt@ashcraftlaw.com](mailto:mparfitt@ashcraftlaw.com)

/s/ P. Leigh O'Dell  
P. LEIGH O'DELL  
Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.  
218 Commerce Street  
Montgomery, Alabama 36104  
334-269-2343  
[leigh.odell@beasleyallen.com](mailto:leigh.odell@beasleyallen.com)

/s/Christopher M. Placitella  
Christopher M. Placitella  
COHEN, PLACITELLA & ROTH, P.C.  
127 Maple Avenue  
Red Bank, NJ 07701  
732-747-9003  
[cplacitella@cprlaw.com](mailto:cplacitella@cprlaw.com)

ATTORNEYS FOR PLAINTIFFS

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 4, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

/s/ P. Leigh O'Dell  
P. LEIGH O'DELL  
Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.  
218 Commerce Street  
Montgomery, Alabama 36104  
334-269-2343  
[leigh.odell@beasleyallen.com](mailto:leigh.odell@beasleyallen.com)

ATTORNEY FOR PLAINTIFFS